## **REMARKS**

Claims 32-46 are withdrawn, without prejudice to a divisional or continuation filing. No amendment of inventorship under 37 CFR 1.17(b) is required.

The Examiner rejected claims 1-31 under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,442,356 to Omata *et al.* ("Omata"). "[A] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Omata fails to disclose every element of claims 1, 12, 19, 23, or 29.

Claim 1 recites an image transfer assembly wherein "a first power supply [is] coupled to at least two of said transfer devices and supplying a voltage thereto." Omata does not disclose a single (first) power supply coupled to at least two transfer devices. The Examiner cited to the four power supplies 170a – 170d, depicted in Fig. 5. Each of these four power supplies is separately and independently coupled to a corresponding transfer device 105a – 105d. That is, a first power supply 170a is coupled to a first transfer device 105a. The first power supply 170a selectively supplies a voltage to the first transfer device 105a, under the control of the power supply controller 180. Similarly, a second power supply 170b is coupled to and selectively supplies power to a second transfer device 105b, also under the control of power supply controller 180. In like manner, a third power supply 170c is coupled to a third transfer device 105c, and a fourth power supply 170d is coupled to a fourth transfer device 105d.

No single (first) power supply – neither 170a, 170b, 170c, nor 170d – is coupled to <u>at least two</u> transfer devices. Consequently, no single (first) power supply supplies voltage to <u>at least two</u> transfer devices. All other embodiments of Omata disclose the same one-to-one

correspondence between power supplies and transfer devices. For at least the reason that Omata does not disclose or suggest a first power supply coupled to <u>at least two</u> of said transfer devices and supplying a voltage thereto, Omata does not anticipate claim 1 and the § 102 rejection must be withdrawn.

Claim 23 is drawn to a method of supplying power to an image forming device, and includes the method step, "supplying a voltage to <u>at least two</u> of said transfer devices from a <u>single</u> power supply." For the reasons discussed above with respect to claim 1, claim 23 is patentably novel over Omata, and the § 102 rejection of claim 23 must be withdrawn.

Claim 12 recites an image transfer assembly wherein "a first power supply [is] coupled to said <u>first and second</u> transfer devices and supplying a first voltage thereto." Nowhere – in the cited Fig. 5 or elsewhere – does Omata disclose a single power supply coupled to <u>first and second</u> transfer devices. The four power supplies 170a – 170d of Fig. 5 are disclosed at col. 8, lines 52 – 54: "Transfer power sources 170a, 170b, 170c, and 170d are <u>respectively</u> connected to the transfer rollers, and the outputs of these transfer power sources are controlled by control means 180." The term *respectively* means "<u>Singly</u> in the order designated or mentioned" (dictionary.com, emphasis added). For at least the reason that Omata does not disclose or suggest a first power supply coupled to said <u>first and second</u> transfer devices and supplying a first voltage thereto, Omata does not anticipate claim 12 and the § 102 rejection must be withdrawn. Claim 19 includes the same limitation, and is patentably novel over Omata for the same reason.

Claim 29 is drawn to a method of printing, and includes the method steps, "applying a first voltage <u>from a first</u> power supply <u>to said first</u> image forming unit," and "applying said first voltage <u>from said first</u> power supply <u>to said second</u> image forming unit." Omata does not disclose or suggest applying a voltage from a single (first) power supply successively to a first image forming unit and to a second image forming unit. As depicted in Fig. 5, each power

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supply 170a – 170d is coupled to a respective, separate, and distinct image forming unit Pa – Pd. It is readily apparent to those of skill in the art that a single (first) power supply in Omata is incapable of providing a voltage to both a first and second image forming unit, as each power supply is connected to one and only one image forming unit. For at least this reason, claims 29 recites patentable novelty over Omata, and the § 102 rejection of must be withdrawn.

All dependent claims include all limitations of their respective parent claim(s).

Accordingly, all pending dependent claims recite patentably novelty over Omata, and their § 102 rejections must be withdrawn.

All pending claims are patentably novel over the art of record. Prompt allowance of all pending claims is thus respectfully requested.

Respectfully submitted,

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